

JURY QUESTIONNAIRE

Instructions for Jury Questionnaire

This questionnaire is designed to obtain information about your background as it is related to your service as a juror in this case. Its use will substantially shorten the jury selection process. The purpose of these questions is to determine whether prospective jurors can impartially decide this case based solely on the evidence presented at trial and the instructions on the law given by the presiding judge. All information contained in this questionnaire will be kept confidential and under seal.

Please write your assigned juror number at the top of each page. Respond to each question. Your candor and honesty is necessary so that both the prosecution and the defense will have a meaningful opportunity to select an impartial jury. Your cooperation is of vital importance.

You are sworn to give true and complete answers and those answers will be available only to the Court and the parties in this case. You are instructed not to discuss this case or the questionnaire with anyone, including your family and fellow jurors.

Please fill out the entire questionnaire. Do not leave any questions blank. If a question does not apply to you in any way, write "N/A" rather than leaving the form blank.

PLEASE PRINT LEGIBLY - PLEASE USE ONLY BLACK INK

Juror Number: _____

Personal Information

1. Name: _____
2. Sex: _____
3. Date of Birth: _____
4. Place of Birth: _____

Residence

5. Address: _____
6. How long have you lived in Northern Virginia: _____

Family Background

7. Please indicate your marital status:

_____ Single and never married
_____ Currently married and have been for _____ years
_____ Single, but married in the past for _____ years
_____ Widowed, but married in the past for _____ years
_____ Other: _____

Employment

8. Are you employed?

_____ Yes _____ No

A. If employed, what is your current occupation / job title? _____

B. Name of employer: _____

C. How long have you been employed at your current job? _____

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9. If unemployed, please describe other responsibilities that you have (childcare, school, etc.)

10. If you are retired or between jobs, what type of work had you been doing?

11. Is your spouse or companion who lives with you employed?

_____ Yes _____ No

A. If employed, what is their current occupation / job title? _____

B. Name of spouse's or companion's employer: _____

Education

12. Check the highest level of education for you and your spouse or companion:

	<u>You</u>	<u>Spouse/ Companion</u>
A. Grade school or less	_____	_____
B. Some high school	_____	_____
C. High school graduate	_____	_____
D. Technical or business school	_____	_____
E. Some college	_____	_____
F. College degree	_____	_____
G. Graduate degree (and describe area)	_____	_____ Area: _____

13. If you are presently a student, please describe briefly your area of study: _____

Juror Number: _____

14. Do you have any difficulty speaking, understanding, reading or writing the English language?

_____ Yes _____ No

A. If yes, please explain the degree of difficulty: _____

News/Media

15. What is your main source for news? [Check the one you rely on the most.]

_____ Newspapers/Magazines
_____ TV or Radio
_____ Internet/Social media websites

16. Please list any newspapers, magazines, TV or radio shows, or Internet or social media websites that you read, watch, or listen to on a regular basis:

Military Service

17. Have you or your spouse or companion ever served in the armed forces?

_____ Yes _____ No

A. If yes, please answer the following, both as to yourself and/or your spouse or companion:

	<u>You</u>	<u>Spouse/Companion</u>
Branch and highest rank or rate	_____	_____
Dates of Service	_____	_____

Juror Number: _____

Home Ownership and Financing

18. Have you ever had a foreign bank account?

_____ Yes _____ No

19. Do you or your spouse own a home?

_____ Yes _____ No

A. If yes, have you now or in the past held a mortgage on that property?

_____ Yes _____ No

B. If yes, please provide a brief description of any financial institution from which you obtained a mortgage and the amount of the mortgage:

20. Have you or your spouse ever refinanced a home mortgage?

_____ Yes _____ No

A. If yes, please provide a brief description of any financial institution from which you obtained the refinancing and the amount that was refinanced:

21. Has a bank ever foreclosed on any property owned by you or your spouse?

_____ Yes _____ No

22. Have you ever been denied a mortgage loan?

_____ Yes _____ No

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- A. If yes, please briefly describe the circumstances and the denial and whether your experience would prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

Criminal Justice Experience

23. Have you, or has any member of your family or close friend or relative, ever been the victim of or witness to a crime, whether or not that crime was reported to law enforcement authorities?

_____ Yes _____ No

- A. If yes, please provide the following information for each person and incident:

Relationship Type of Crime Victim / Witness? Police Report? Was Anyone Caught? Outcome?

24. Have you, or has any member of your family or close friend or relative, ever been accused of, arrested for, or charged with a crime?

_____ Yes _____ No

- A. If yes, please provide the following:

Relationship (myself, dad, etc.) Crime Charged Case Outcome?

Juror Number: _____

- B. If yes, please provide a brief description of the alleged crime(s) and the events leading up to the accusation, arrest, or charge:

- C. If yes, do you feel that you, your family member, close friend, or relative were/was treated fairly by the criminal justice system?

25. Have you, or has any member of your family or close friend or relative, ever been audited by the Internal Revenue Service?

_____ Yes _____ No

- A. If yes, please provide the following:

Relationship (myself, dad, etc.) Date of Audit Outcome?

- B. If yes, do you feel that you, your family member, close friend, or relative were/was treated fairly by the Internal Revenue Service?

Juror Number: _____

26. Apart from jury service, have you ever been involved in any legal proceeding, in any capacity, for example as a plaintiff, defendant, victim, lawyer, witness, or expert?

_____ Yes _____ No

A. If yes, please state when and explain why you appeared in court:

B. If yes, did the legal process in that instance operate fairly in your opinion?

Jury Service

27. Have you ever served as a juror at a trial in a federal, state, or local court prior to today?

_____ Yes _____ No

A. If yes, without disclosing the verdict that you reached, please complete the following for each trial on which you served as a juror:

<u>Criminal or Civil?</u>	<u>Type of Allegations?</u>	<u>When did you serve?</u>	<u>Where did you serve?</u>	<u>Did the jury reach a unanimous verdict or, if permitted by the applicable law, a majority verdict?</u>
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28. Have you ever served as a juror on a grand jury in federal or state court?

_____ Yes _____ No

Juror Number: _____

A. If yes, when and where: _____

B. If yes, was the grand jury on which you served able to reach agreement on the issuance of true bills?

_____ Yes _____ No

C. If your answer to the prior question is no, describe the nature of the case or cases on which the grand jury on which you served was unable to reach agreement on the issuance of true bills.

Law Enforcement

29. Have you, or any members of your family, ever been employed by any law enforcement agency, such as: a police department, sheriff's department, constable's office, the Federal Bureau of Investigation (FBI), the Drug Enforcement Administration (DEA), the Bureau of Alcohol Tobacco and Firearms (ATF), the U.S. Marshal's Service, the U.S. Park Police, a United States Attorney's Office, the United States Department of Justice, a District or State's Attorney's Office, a probation or parole office, the Bureau of Prisons, or any other state, local, or federal law enforcement agency or private security force?

_____ Yes _____ No

A. If yes, for each person (yourself or family member) please indicate the law enforcement office or agency, the period of time employed, if known, and a general description of the job duties:

Juror Number: _____

- B. If yes, would the law enforcement employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

30. Have you, or any members of your family, ever been employed by the Internal Revenue Service?

_____ Yes _____ No

- A. If yes, for each person (yourself or family member) please indicate the period of time employed, if known, and a general description of the job duties:

- B. If yes, would the employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

31. A number of witnesses may be either federal or state law enforcement officers. Would you tend to believe or to disbelieve the testimony of any law enforcement witness merely because that person is a law enforcement officer?

_____ Yes _____ No

- A. If yes, please explain why you would be more or less willing to believe such a witness and why:

Juror Number: _____

32. In this case, the United States is represented by the United States Department of Justice through Special Counsel Robert S. Mueller, III. Is there anything regarding the Special Counsel's Office that would prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

_____ Yes _____ No

A. If yes, please explain why:

Work Experience

33. Have you, or any members of your immediate family, ever been employed as an auditor, mortgage officer, tax preparer, or accountant?

_____ Yes _____ No

A. If yes, for each person (yourself or family member) please indicate the period of time employed, if known, and a general description of the job duties:

B. If yes, would the employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

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34. Have you, or any member of your immediate family, ever worked as an employee of a bank or financial institution?

_____ Yes _____ No

A. If yes, for each person (yourself or family member) please indicate the period of time employed, if known, and a general description of the job duties:

B. If yes, would the employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case based solely on the evidence presented and the Court's instructions on the law?

35. Have you, or any member of your immediate family, ever worked in the legal profession, either as a lawyer, paralegal, or in a law office, including a prosecutor's or public defender's office?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

- B. If yes, would the legal employment that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case solely on the evidence presented and the Court's instructions on the law:

36. Have you, or any member of your immediate family, had any legal training, including law courses, paralegal programs, or on-the-job training?

_____ Yes _____ No

- A. If yes, please explain:

- B. If yes, would the legal training that you described in the previous question prevent or hinder you in any way from rendering a fair and impartial verdict in this case solely on the evidence presented and the Court's instructions on the law:

Nature of the Evidence and the Charged Crimes

37. The indictment charges the defendant with bank fraud, filing false tax returns, failing to report foreign bank accounts, and related conspiracy offenses. Is there anything about the nature of those charges that would make it difficult to be a fair and impartial juror in this case?

_____ Yes _____ No

Juror Number: _____

A. If yes, please explain:

38. The indictment charges that certain of the income involved in the tax and bank fraud charges was derived from political consulting and public relations work. Is there anything about the nature of those charges that would make it difficult to be a fair and impartial juror in this case?

_____ Yes _____ No

A. If yes, please explain:

39. The indictment charges that certain of the income involved in the tax and bank fraud charges was derived from work for Ukrainian government officials, politicians, and political parties. Is there anything about the nature of those allegations that would make it difficult to be a fair and impartial juror in this case?

_____ Yes _____ No

A. If yes, please explain:

40. Some of the witnesses in this case may be individuals who were involved in crimes themselves. They would testify pursuant to a cooperation agreement with the government or an immunity order. Is there anything that will prevent you from evaluating their testimony fairly and impartially in accordance with the Court's instructions?

_____ Yes _____ No

Juror Number: _____

A. If yes, please explain:

Knowledge of the Case

41. This case has received significant publicity in the media. Have you seen, read, or heard anything at all about this case in any form of media, including newspaper, television, radio, or internet?

_____ Yes _____ No

A. If yes, please explain (i) what you have seen, read, or heard, (ii) the source of that information, and (iii) when that occurred:

B. If yes, has the news coverage or other information you have seen, read, or heard about this case caused you to form an opinion about the defendant's guilt or innocence?

_____ Yes _____ No

C. If yes, please explain:

Juror Number: _____

- D. Would you be able to put to one side everything you have seen, read, or heard about this case and not consider that information at all and decide the case fairly and impartially based solely on the evidence presented and the Court's instructions of law?

42. Have you, any member of your immediate family, or any close personal friend ever run for or held a political office in the federal, state, or local government?

_____ Yes _____ No

- A. If yes, would anything about that person's running for or holding political office cause you to form an opinion about the defendant's guilt or innocence?

_____ Yes _____ No

- B. If yes, please explain:

43. Do you, any member of your immediate family, or any close personal friend have any connection to Ukraine?

_____ Yes _____ No

- A. If yes, would anything about that connection to Ukraine cause you to form an opinion about the defendant's guilt or innocence?

_____ Yes _____ No

- B. If yes, please explain:

Juror Number: _____

Miscellaneous

44. The following is a partial list of individuals who may be associated with this case. Do you, to your knowledge, have any personal, family, or business connection of any sort with any of them? If yes, please circle the name(s) with which you have such a connection and explain that connection in the space below:

[list to be provided]

45. The jury will be instructed that the defendant is presumed to be innocent throughout the trial and that the defendant cannot be found guilty of any offense unless and until the government has proven each element of that offense beyond a reasonable doubt. Would you find it difficult for any reason to obey that instruction?

_____ Yes _____ No

A. If yes, please explain:

46. If you are selected as a juror in this case, would it be difficult for you to disregard any ideas, notions, or beliefs about the law you may hold and render a fair and impartial verdict based solely on the evidence presented and the Court's instructions of law?

Juror Number: _____

47. Do you suffer from any physical or mental condition(s) that would affect your ability to pay close and careful attention to the evidence and to render an impartial verdict?

_____ Yes _____ No

A. If yes, please explain:

48. This trial may run for approximately three weeks. In this respect, you should know that it is unlawful for an employer to discharge, threaten to discharge, intimidate, or coerce any employee because of the employee's jury service. Given this, is there any truly exigent circumstance that would preclude you from serving on this jury?

_____ Yes _____ No

A. If yes, please explain:

49. Do you have any moral, religious, or ethical beliefs that prevent you from sitting in judgment of another person in a criminal trial?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

50. Is there anything about the nature of this case, including specifically that (i) it involves allegations of bank fraud and filing false tax returns and (ii) it involves allegations relating to payments for lobbying work on behalf of Ukrainian politicians, that would prevent or hinder you in any way from rendering a fair and impartial verdict based solely on the evidence presented and the Court's instructions of law?

_____ Yes _____ No

A. If yes, please explain:

51. Is there anything about the nature of the questions in this questionnaire that suggests to you that you will not be able to sit as fair and impartial?

_____ Yes _____ No

A. If yes, please explain:

52. Do you know of any other reason why you cannot sit as a juror in this case and judge evidence presented fairly and impartially and apply the law as instructed by the Court?

_____ Yes _____ No

A. If yes, please explain:

Juror Number: _____

I, _____, hereby declare under penalty of perjury that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others, or received assistance in completing the questionnaire. I have answered all of the above questions myself.

Executed in the Eastern District of Virginia, on this ____ day of _____, 2018.

Signature